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MEMO ENDORSED

October 1, 2020

Via ECF

The Honorable Valerie E. Caproni
United States District Judge for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Ruiz v. Keratinbar Inc., et al; Case No. 17-cv-02216 (VEC)

Dear Judge Caproni:

As the Court knows, we, for now, represent Plaintiff Angel Ruiz in the above-referenced employment discrimination matter. As the Court further knows, after hearing from Plaintiff and our office on a call held on September 18, 2020, the Court ordered that our firm file its motion to withdraw and for any associated lien by October 2, 2010. ECF # 146. We write now to respectfully request a one-week extension, until October 9, 2020, to file this motion. The reason for this request is that other work obligations, combined with the time required to compile the materials needed to support the lien request, is causing the completion of the motion to take longer than expected. This is our first request for an extension of this deadline, no other dates or deadlines will be impacted, and Defendants' counsel consents to this request. Given the nature of the relationship between our firm and Plaintiff that is causing this motion, we have not solicited his consent to this extension. We thank the Court for its time and attention to this matter.

Respectfully submitted,



Shani J. Walker, Esq.

For the Firm

C: All Parties (via ECF)

Per this Court's Individual Rules, requests for extensions must be made at least 48 hours in advance of the original deadline. Plaintiff's counsel was well aware of the October 2, 2020 deadline, and rather than basing its request on an unforeseen circumstance, counsel cites "other work obligations" and notes that the motions have taken longer than expected. Notwithstanding that two weeks should have been sufficient to file these two motions, Plaintiff's counsel has provided no reason to justify its decision to wait until the eleventh hour to file this request. Plaintiff's counsel's motion to withdraw and motion for a lien are due not later than **October 5, 2020**. Further requests for extension will not be granted.

SO ORDERED.

 10/1/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE